

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WEATHERFORD SWITZERLAND TRADING  
AND DEVELOPMENT GMBH, solely in its  
capacity as Administrative Agent of a certain  
indenture dated as of June 28, 2016, and  
WEATHERFORD LATIN AMERICA, S.C.A.,

Plaintiffs,

v.

PETRÓLEOS DE VENEZUELA, S.A. and  
PDVSA PETRÓLEO, S.A.,

Defendants.

Case No.: 1:23-cv-10703

ORAL ARGUMENT  
REQUESTED

**NOTICE OF DEFENDANTS' MOTION TO STRIKE**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Defendants Petróleos de Venezuela, S.A. ("PDVSA") and PDVSA Petróleo, S.A. ("Petróleo," and together with PDVSA, "Defendants") will move this Court for an order striking the Reply Declaration of Ysaura Ocando ("Ocando Declaration") (ECF Doc. No. 20), the portions of Plaintiffs' Memorandum of Law in Further Support of Plaintiffs' Motion for Summary Judgment ("Reply") (ECF Doc. No. 18) that reference or rely on the Ocando Declaration, Exhibits 9 (ECF Doc. No. 19-3) and 10 (ECF Doc. No. 19-4) to the Declaration of Sari Kolatch, and the portions of the Reply (ECF Doc. No. 18) that exceed this Court's ten-page limit for reply memoranda.

PLEASE TAKE FURTHER NOTICE that any opposition to this motion shall be served on or before April 5, 2024, and that Defendants' reply shall be served on or before April 12, 2024.

Dated: March 22, 2024  
New York, New York

**PAUL HASTINGS LLP**

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